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To: USEPA Docket No. EPA-R05-OAR-2018-0035 [*via: www.regulations.gov*]

From: Michael Cassidy, Kohler Co.

COMMENTS ON PROPOSED RULEMAKING
Federal Register Vol. 84, No. 32, Friday, February 15, 2019, pages 4422 – 4426
Revision of Sheboygan County, Wisconsin Nonattainment Designation for the 1997 and 2008 Ozone Standards and Clean Data Determination for the 2008 Ozone Standards

Thank you for the opportunity to review and comment on the referenced proposed determinations for Sheboygan County Wisconsin for the 1997 and 2008 Ozone NAAQSs. Kohler Co. manufactures plumbing fixtures, small engines, and electric generators at locations in Sheboygan County and **supports** the proposed revision to the existing non-attainment area boundaries by splitting the County into two separate areas (an inland area and a shoreline area). Kohler Co. also **supports** the proposed clean data determination for the Inland Sheboygan County area (the Haven monitor) for the 2008 Ozone NAAQS.

Justification to Split the Sheboygan County Nonattainment Area:
Kohler Co. supports EPA's proposal to split the County into two distinct areas for purposes of making attainment designations for the 2008 and 1997 Ozone NAAQSs as described in the Federal Register notice (Inland Sheboygan County and Shoreline Sheboygan County).

The reasons for our support include:

1) The State (WDNR) operates two ozone monitors in Sheboygan County. One (the Kohler-Andrae monitor) is located right at the lakeshore, south of (upwind from) the City of Sheboygan metropolitan area. The other (the Haven monitor) is located approximately three miles inland from the lakeshore, just northwest of (downwind from) the City of Sheboygan.
2) It is important to understand that the Kohler-Andrae monitor is improperly sited for NAAQS attainment demonstration purposes. The monitor was originally sited by EPA to help assess pollutant transport along the Lake Michigan western shoreline, and it essentially only measures what is blown into the County from upwind sources. The "Wisconsin Department of Natural Resources 2019 Air Monitoring Network Plan" still characterizes the objectives of the Kohler Andrae monitor as measuring ozone regional transport.[1] The monitor is not useful to assess how emissions sources in the County influence ozone concentrations in the County. The monitor also measures ozone levels near the shoreline, before ozone dissipates moving inland. As such, the Kohler-Andrae monitor ozone levels are not representative of air quality inland of the lakeshore.
3) In contrast, the Haven monitor is properly located per EPA criteria for use in NAAQS attainment demonstration purposes.

[1] Wisconsin Department of Natural Resources 2019 Air Monitoring Network Plan (July 2018) , p. D-58, available at, https://dnr.wi.gov/topic/AirQuality/documents/2019NetworkPlanRevisedSubmitted.pdf

4) The data from the Haven monitor show the air quality in the County, a little inland from the lakeshore, meets the 2008 Ozone NAAQS (as well as the 1997 and 2015 ozone NAAQS). The data from the Kohler-Andrae monitor show the air quality along the lakeshore, transported into the County from upwind sources, does not currently meet the 2008 Ozone NAAQS due to regional transport.[2]
5) Splitting the County into two areas for attainment designation purposes is authorized under the Clean Air Act as referenced in the Federal Register notification. There is also precedent for splitting counties for attainment designation purposes.
6) The proposed boundary between the Shoreline Sheboygan County area and Inland Sheboygan County area is consistent with the boundary for the 2015 Ozone NAAQS already approved by EPA (6/4/18 – 83 FR 25776). This will ease in the implementation of the ozone program in the State.
7) As currently regulated, a large part of Sheboygan County is designated nonattainment for the less strict 1997 and 2008 Ozone NAAQSs, but attainment for the more strict 2015 Ozone NAAQS. EPA's proposal will rectify this nonsensical situation for those sources subject to this regulatory dilemma, especially when the same monitoring data apply equally to all three NAAQSs.

Justification for the Clean Data Determination for the Inland Sheboygan County Area for the 2008 Ozone NAAQS:

As explained in EPA's proposal, the 2015-2017 ozone design value for the Haven monitor (proposed Inland Sheboygan County nonattainment area) is 0.070 ppm, which is well below the 2008 NAAQS concentration of 0.075 ppm. The WDNR's and EPA's analyses confirm these results for this monitoring period, and so this determination is justified under the authority of the Clean Air Act, and Kohler Co. supports this determination as explained in the Federal Register notice.

Thank you for your consideration of these comments. Please contact me if you have any questions on these comments or would like additional information.

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[2] LADCO source apportionment modeling demonstrates that Illinois emission sources are responsible for 23% of the ozone measured at the Kohler Andrae monitor. "Attainment Plan for the Sheboygan County, Wisconsin 2008 8-Hour Ozone Nonattainment Area (September 2017), p. 5, available at, https://dnr.wi.gov/topic/AirQuality/documents/SheboyganAttainmentPlan.pdf.